### **APPENDIX D**

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1	MICHAEL A. JACOBS (CA MJacobs@mofo.com	SBN 111664)				
2	ARTURO J. GONZÁLEZ (CA SBN 121490)  AGonzalez@mofo.com					
3	MORRISON & FOERSTER 1 425 Market Street	LLP				
4	San Francisco, California 941	105-2482				
5	Telephone: 415.268.7000 Facsimile: 415.268.7522					
6	KAREN L. DUNN (Pro Hac	Vice)				
7	kdunn@bsfllp.com HAMISH P.M. HUME ( <i>Pro l</i>	Hac Vice)				
8	hhume@bsfllp.com BOIES SCHILLER FLEXNE					
9	1401 New York Avenue, N.W Washington DC 20005	V.				
10	Telephone: 202.237.2727 Facsimile: 202.237.6131					
11	WILLIAM CARMODY (Pro	Hac Vice)				
12	bcarmody@susmangodfrey.co SHAWN RABIN ( <i>Pro Hac V</i>					
13	srabin@SusmanGodfrey.com SUSMAN GODFREY LLP					
14	1301 Avenue of the Americas, 32nd Floor New York, NY 10019-6023					
	Telephone: 212.336.8330 Facsimile: 202.336.8340					
15						
16 17	Attorneys for Defendants UBER TECHNOLOGIES, IN and OTTOMOTTO LLC	IC.				
18	Ţ	UNITED STATES DI	STRICT COURT			
19	NC	RTHERN DISTRICT	Γ OF CALIFORN	IA		
20		SAN FRANCISC	O DIVISION			
21	WAYMO LLC,		Case No. 3:17-cv-	-00939-WHA		
22	Plaintif	f,	<b>DEFENDANTS</b>	UBER		
23	v.		TECHNOLOGII OTTOMOTTO	ES, INC. AND LLC'S SECOND		
24	UBER TECHNOLOGIES, IN	IC.,	AMENDED FEI WITNESS LIST	D. R. CIV. P. 26(A)(3)		
25	OTTOMOTTO LLC; OTTO 'LLC,		Judge: The Hono	orable William Alsup		
26	Defend	ants.	Trial Date: Februa	ary 5, 2018		
27						
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Defendants Uber Technologies, Inc. and Ottomotto LLC ("Uber") hereby submit their witness list for trial, pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's Guidelines for Trial and Final Pretrial Conference in Civil Jury Cases.

Uber identifies the name, contact information, and substance of the testimony of each witness it expects to present or may present at trial, other than solely for impeachment. Pursuant to the Court's Guidelines, non-cumulative testimony is identified below in italics.

#### I. LIVE WITNESSES

Uber expects to present live testimony from the following witnesses:

Witness	Contact Information	Substance of Trial Testimony
Boehmke, Scott	[Contact through counsel of record]  Uber Technologies, Inc. Advanced Technologies Center 100 32nd St, Pittsburgh, PA 15201	Mr. Boehmke is an engineering manager within Uber's Advanced Technologies Group, responsible for hardware development and application in the self-driving vehicle project. He was previously a project engineer at Carnegie Mellon where he designed LiDAR and Radar sensors. He may testify regarding design and development of Defendant's LiDAR, Defendant's non-misappropriation of Waymo's trade secrets; inspections pursuant to the Court's provisional remedy order; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.
Epstein, Michael	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Mr. Epstein is a product manager at Waymo. He is expected to testify regarding Waymo's decision to enter the Transportation as a Service ("TaaS") market, estimates and forecasts of the ride-sharing market and Waymo's share of the ride-sharing market and Waymo's business and strategic plans (and plans generally) for the ride-sharing market, including projections for revenue generation and profitability and including TaaS, and competition with Uber.

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1	Witness	<b>Contact Information</b>	Substance of Trial Testimony
	Faulkner, Kevin	[Contact through counsel of	Mr. Faulkner is Managing Director at
2		record]	Stroz Friedberg and is an expert retained by Uber and Ottomotto to
3			testify regarding the forensic
4		Stroz Friedberg 32 Avenue of the Americas,	examination of Uber-issued devices and
4		Floor 4	data and confirmation of the absence of evidence of trade secret
5		New York, NY 10013	misappropriation through and during
6		Phone: (212) 981-6540	compliance with the Court's provisional remedy order. He will
7			testify regarding the matters disclosed
7			in his expert reports of September 7, 2017, November 17, 2017, and January
8			19, 2018*.
9	Friedberg, Eric	Stroz Friedberg	Mr. Friedberg is a co-founder of Stroz
10	Thedderg, Elic	32 Avenue of the Americas,	Friedberg and currently serves as the
10		Floor 4	<i>co-President.</i> He will testify regarding Stroz Friedberg's investigation and due
11		New York, NY 10013	diligence for Uber's potential
12		Phone: (212) 981-6540	acquisition of Ottomotto and Otto Trucking, LLC, including with respect
12			to the deletion of the 14,000
13	Haslim, James	[Contact through council of	downloaded files.  Mr. Haslim is a senior engineering
14	Trasmin, James	[Contact through counsel of record]	manager at Uber, responsible for the
15		-	technical development of Uber's LiDAR sensors, and previously worked at Tyto.
		Uber Technologies, Inc.	He may testify regarding design and
16		1455 Market Street, Floor 4	development of Defendants' LiDAR; Defendants' non-misappropriation of
17		San Francisco, CA 94103	Waymo's trade secrets; knowledge of
18			Odin Wave LLC and Tyto LiDAR LLC; and confirmation of the
			absence of evidence of trade secret
19			misappropriation through and during compliance with the Court's
20			provisional remedy order.
21			
			provisional femoty order.

Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

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1	Witness	Contact Information	Substance of Trial Testimony  Mr Kalaniak is Ubar's as founder and
2	Kalanick, Travis	[Contact through counsel of	Mr Kalanick is Uber's co-founder and former Chief Executive Officer. He
_		record]	may testify regarding Defendants'
3			business model and strategy for
		Uber Technologies, Inc.	autonomous vehicles; Defendants' non-
4		1455 Market Street, Floor 4	misappropriation of Waymo's trade
5		San Francisco, CA 94103	secrets; Uber's decision to acquire Ottomotto; steps taken by Defendants to prevent trade secrets from prior
6			employers coming to Defendants; Defendants' autonomous vehicle
7			program; March 11, 2016 meeting with
8			Anthony Levandowski; knowledge of Waymo's discussions with Defendants
9			regarding a partnership with Defendants in the self-driving
10			vehicle/ride-sharing space; Defendants' employment of Anthony Levandowski;
11			and Defendants' termination of Anthony Levandowski.
12	Krafcik, John	Waymo LLC	Mr. Krafcik is Waymo's Chief Executive Officer. He is expected to
12		1600 Amphitheatre Parkway	testify regarding development and
13		Mountain View, CA 94043	operation of Waymo's autonomous
			vehicle program; Anthony
14 15			Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses;
16			knowledge of Waymo employee involvement in side projects and side
17			businesses, including that of Anthony Levandowski; Waymo's business
18			plans; knowledge of discussions with Defendants regarding a partnership
19			with Defendants in the self-driving
			vehicle/ride-sharing space; and knowledge of the Project Chauffeur
20	T -1-1 N/C 1 1		bonus program.  Dr. Lebby is an expert retained by Uber
21	Lebby, Michael	[Contact through counsel of record]	and Ottomotto to testify regarding non- misappropriation of Waymo's trade
22			secrets. He will testify regarding the matters disclosed in his expert report of
23			September 7, 2017.
24		Email: lebby@usc.edu	
25			

Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

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1	Witness	Contact Information	Substance of Trial Testimony
2	McManamon, Paul	[Contact through counsel of record]	Dr. McManamon is an expert retained by Uber and Ottomotto to testify regarding non-misappropriation of
3		University of Dayton	Waymo's trade secrets. He will testify regarding the matters disclosed in his
4		300 College Park Fitz Hall Room 580Q	expert report of September 7, 2017, and his declaration of April 7, 2017.
5		Dayton, OH 45469 Phone: (937) 344-3921	
6	Meyhofer, Eric	[Contact through counsel of record]	Mr, Meyhofer is Head of Uber's Advanced Technologies Group. He
7		Uber Technologies, Inc.	may testify regarding the design and development of Defendants' LiDAR; Defendants' autonomous vehicle
8		Advanced Technologies Center 100 32nd St	program; Defendants' non- misappropriation of Waymo's trade
9		Pittsburgh, PA 15201	secrets; Defendants' business model and strategy for autonomous vehicles;
10 11			Uber's decision to acquire Ottomotto; termination of Anthony Levandowski;
12			confirmation of the absence of evidence of trade secret misappropriation
13			through and during compliance with the Court's provisional remedy order; steps
14			taken by Defendants to prevent trade secrets from prior employers of
15			Defendants' employees coming to Defendants; and the use or non-use of ephemeral communications, non-
16			attributable devices, and attorney-client privileged designations within Uber's
17		245 81 1 1 8 1	ATG*.
18	Nestinger, Stephen	345 Digital Drive Morgan Hill, CA 95037 Phone: (408) 465-2800	Mr. Nestinger is Director of Mechanical Engineering at Velodyne. He is expected to testify regarding the
19		Contact through counsel:	technologies in LiDAR sensors that Velodyne has made or sold, including
20		John V. Picone III, Esq.	VLP-16, HDL-32E, HDL64E, Puck Hi- Res, and Puck Lite.
21		Hopkins & Carley The Letitia Building	
22		70 South First Street San Jose CA 95113	
23		Phone: (408) 286-9800 Email:	
24		jpicone@hopkinscarley.com	

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Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043  Alphabet Inc. 1610 Alphabet Inc. 1620 He is expected to testify regarding development and subsunesses; knowledge of Waymo's policies surrounding side projects and side businesses, including that of Anthony Levandowski, Waymo's businesses plans; knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Mr. Page is Google's co-founder and Chief Executive Office of Google's parent company, Alphabet Inc. He is expected to testify regarding development in side projects and side businesses; knowledge of Waymo omployee involvement in side projects and side businesses; knowledge of discussions with Defendants regarding a partner from Waymo's businesses plans; knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Mr. Page is Google's parent of Waymo's policies surrounding side projects and side businesses; knowledge of Waymo omployee involvement in side projects and side businesses; knowledge of discussions with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Mr. Page is Google's expartion of Waymo's policies surrounding side projects and side businesses; kn	1	Witness	<b>Contact Information</b>	Substance of Trial Testimony
Mountain View, CA 94043  Me is expected to testify regarding development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Deetzscher, Cam  Contact through counsel of record  Wr. Poetzscher is Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	2	Page, Larry	Alphabet Inc.	
Mountain View, CA 94043    He is expected to testify regarding development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.    Poetzscher, Cam	2		1600 Amphitheatre Parkway	
development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam  [Contact through counsel of record]  Poetzscher, Cam  [Contact through counsel of record]  Poetzscher, Cam  [Contact through counsel of record]  President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto  Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	3		Mountain View, CA 94043	
program; Anthony Levandowski's departure from Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam [Contact through counsel of record]  Poetzscher, Cam [Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  Mr. Poetzscher is Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.				
departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses; knowledge of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam [Contact through counsel of record]  Determine the project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  Mr. Poetzscher is Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	4			
policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam [Contact through counsel of record]  Poetzscher, Cam [Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  Mr. Poetzscher is Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	5			
side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam [Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  Begin and the project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Trucking LLC; Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	3			
employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam [Contact through counsel of record]  Poetzscher, Cam [Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  Mr. Poetzscher is Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misapropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	6			
Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam [Contact through counsel of record]  Wr. Poetzscher is Uber's Vice President of Corporate Development, He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto  Trucking LLC; Uber's decision to acquire Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.				employee involvement in side projects
business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam  [Contact through counsel of record]    Detact through counsel of record	7			
discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam  [Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  San Francisco, CA 94103  discussions with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Mr. Poetzscher is Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	R			
a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam  [Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  San Francisco, CA 94103  [Contact through counsel of record]  Mr. Poetzscher is Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	0			
and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam  [Contact through counsel of record]    Wr. Poetzscher is Uber's Vice President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto   Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	9			a partnership with Defendants in the
bonus program, and his concerns about competition from Uber and Anthony Levandowski.  Poetzscher, Cam  [Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquiristion; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	10			
Poetzscher, Cam	10			
Poetzscher, Cam  [Contact through counsel of record]  [Mr. Poetzscher is Uber's Vice President of Corporate Development.  He may testify regarding Defendants' non-misappropriation of trade secrets; business of Otto  Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	11			
President of Corporate Development.   He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto	11			
record]  President of Corporate Development. He may testify regarding Defendants' non-misappropriation of Waymo's trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	12	Poetzscher, Cam	[Contact through counsel of	
Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	12			
trade secrets; business of Otto Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	13			
15 San Francisco, CA 94103  Trucking LLC; Uber's decision to acquire Ottomotto; Uber's indemnification agreement with Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	14		Uber Technologies, Inc.	trade secrets; business of Otto
16 Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.			1455 Market Street, Floor 4	Trucking LLC; Uber's decision to
Ottomotto; Uber's meetings with Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	15		San Francisco, CA 94103	
Anthony Levandowski, Ottomotto and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	16			
and/or Otto Trucking before April 11, 2016; Stroz due diligence for the Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	10			
Uber/Ottomotto acquisition; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	17			and/or Otto Trucking before April 11,
19 confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	10			
of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	18			
through and during compliance with the Court's provisional remedy order.	19			
20 Court's provisional remedy order.				through and during compliance with the
$_{21}\parallel$	20			Court's provisional remedy order.
	21			

Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

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1	Witness	Contact Information	Substance of Trial Testimony
2	Ron, Lior	[Contact through counsel of	Mr. Lior is Senior Director at
2		record]	OttoFreight, was a co-founder of Ottomotto, and previously worked at
3			Google. He may testify regarding the
4		Uber Technologies, Inc.	nature of employment at Waymo and
4		1455 Market Street, Floor 4	Defendants; Anthony Levandowski's departure from Waymo; Waymo's
5		San Francisco, CA 94103	policies surrounding side projects and
6			side businesses; knowledge of Waymo employee involvement in side projects
U			and side businesses, including that of
7			Anthony Levandowski; knowledge of
8			the Project Chauffeur bonus program; steps taken by Defendants to prevent
			trade secrets from prior employers of
9			Defendants' employees coming to
10			Defendants; Defendants' non- misappropriation of Waymo's trade
			secrets; formation, purpose, and
11			business of Otto Trucking LLC;
12			formation, purpose, and business of Ottomotto; Ottomotto's decision to be
			acquired by Uber; March 11, 2016
13			meeting with Anthony Levandowski;
14			Stroz due diligence for the Uber/Ottomotto acquisition;
			confirmation of the absence of evidence
15			of trade secret misappropriation
16			through and during compliance with the Court's provisional remedy order;
1.7			design and development of Ottomotto's
17			LiDAR; Uber's security group (including SSG, MA, and Threat
18			Operations) as it relates to Uber's
10			ATG*; Uber's competitive intelligence
19			practices*; and the use or non-use of non-attributable devices, ephemeral
20			communications, and attorney-client
21			privileged designations within Uber's ATG*.
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1	Witness	<b>Contact Information</b>	Substance of Trial Testimony
2	Sullivan, Stacy	Waymo LLC 1600 Amphitheatre Parkway	Ms. Sullivan is Vice President for People Operations and Chief Culture
3		Mountain View, CA 94043	Officer at Google. She is expected to testify regarding communication with
4			Larry Page regarding Anthony Levandowski, Mr. Levandowski's
5			alleged recruitment of Waymo employees, the Chauffeur bonus plan, friction on the Chauffeur team, a
6			meeting with Anthony Levandowski and Chelsea Bailey after
7			Mr. Levandowksi left Google, the competition for talent, investigation (or
8			lack thereof) of personal devices of new Google employees, and Larry Page's
9			concerns about competition from Anthony Levandowski.
10	Urmson, Chris		Mr. Urmson was Waymo's former Chief Technology Officer. He is
11			expected to testify regarding development and operation of
12			Waymo's autonomous vehicle program; Anthony Levandowski's
13			departure from Waymo; Waymo's employee policies concerning
14			confidential and trade secret information; Waymo's policies
15			surrounding side projects and side businesses; knowledge of Waymo
16			employee involvement in side projects and side businesses, including that of
17 18			Anthony Levandowski; and knowledge of the Project Chauffeur bonus
19		1	program.
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Witness	Contact Information	Substance of Trial Testimony
Zbrozek, Sasha	Waymo LLC	Mr. Zbrozek is an electrical hardware
	1600 Amphitheatre Parkway	engineer on Waymo's, and before that,
	Mountain View, CA 94043	Google's, self-driving car project. He
	Wountain view, Cri y 10 13	is expected to testify regarding
		Waymo's measures to protect the security of Waymo's confidential
		documents, servers, and SVN
		repository; Waymo's employee policies
		concerning confidential and trade secret information; his development of
		instructions for logging into the SVN repository and the fact that following
		his instructions downloads the entire database; that the documents in that
		database are "low value" and that he
		was concerned that the lawyers were ascribing suspicion to Anthony
		Levandowski's alleged downloading; and his participation in Waymo's
		forensic investigation into alleged
Clark, Craig*	Ctured average & Clauses	misappropriation of trade secrets.  Craig Clark is a former legal director
Clark, Clarg	Stumphauzer & Sloman	at Uber who worked with its security
	One SE Third Avenue	team. Mr. Clark is expected to testify
	Suite 1820	about Uber's security group's practices
	Miami, FL 33131	regarding non-attributable devices,
		ephemeral communications, and
		attorney-client privileged designations;
		Uber's competitive intelligence
		practices; and relationship and
Г '1 Т1 Ф		interaction with Uber ATG.
Facciola, John*	Georgetown University Law	John Facciola is a professor of law at Georgetown with substantial
	Center	experience with and knowledge about
	600 New Jersey Avenue NW	data retention who advised Uber on
	Washington, DC 20001	issues related to data retention. He is
		expected to testify about his
		involvement in and knowledge of
		Uber's data retention policies and
		programs; and knowledge of best
O + D + 1.1 %		practices in data retention.
Oot, Patrick*	Shook, Hardy & Bacon	Patrick Oot is a partner at Shook Hardy & Bacon with substantial
	1155 F Street NW, Suite 200	experience with and knowledge about
	Washington, DC 20004	data retention who advised Uber on
		issues related to data retention. He is
		expected to testify about his
		involvement in and knowledge of
		Uber's data retention policies and
		programs; and knowledge of best
		practices in data retention.

Uber may present live testimony from the following witnesses:

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2	Witness	Contact Information	Trial Testimony
3	Bailey, Chelsea	Waymo LLC	Ms. Bailey is a human resources
		1600 Amphitheatre Parkway	business partner at Google[x]. She is
4		Mountain View, CA 94043	expected to testify regarding Waymo's
5			policies concerning confidential and trade secret information; Waymo
3			employment and compensation issues;
6			and the Project Chauffeur bonus
			program.
7	Bares, John	[Contact through counsel of	Mr. Bares is the former Operations
8	Bures, voini	record]	Director at Uber's Advanced
8			Technologies Group. He may testify
9		Uber Technologies, Inc.	regarding design and development of
10		Advanced Technologies Center	Defendants' LiDAR; Defendants'
10		100 32nd St, Pittsburgh, PA	autonomous vehicle program;
11		15201	Defendants' non-misappropriation of
			Waymo's trade secrets; Defendants'
12			business model and strategy for
13			autonomous vehicles; Uber's decision
13			to acquire Ottomotto; steps taken by
14			Defendants to prevent trade secrets from prior employers of Defendants'
			employees coming to Defendants; and
15			confirmation of the absence of
16			evidence of trade secret
			misappropriation through and during
17			compliance with the Court's
18			provisional remedy order.
10	Bratic, Walter	[Contact through counsel of	Mr. Bratic is an expert retained by
19		record]	Uber and Ottomotto to testify
• •			regarding damages. He will testify
20		OverMont 3737 Buffalo Speedway	regarding the matters disclosed in his
21		Suite 1600	expert report of September 7, 2017.
-1		Houston, Texas 77098	
22		Phone: (713) 403-3307	
22		Email:	
23		walter.bratic@whitleypenn.com	
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Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

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1	Witness	<b>Contact Information</b>	Trial Testimony
2	Brin, Sergey	Alphabet Inc. 1600 Amphitheatre Parkway	Mr. Brin is a co-founder of Google and President of Google's parent company,
3		Mountain View, CA 94043	Alphabet Inc. He is expected to testify regarding development and operation
4			of Waymo's autonomous vehicle program; Anthony Levandowski's
5			departure from Waymo; Waymo's
6			policies surrounding side projects and side businesses; and knowledge of
7			Waymo employee involvement in side projects and side businesses, including
8	D. C.		that of Anthony Levandowski.
9	Brown, Gary	Waymo LLC 1600 Amphitheatre Parkway	Mr. Brown is a Forensics Security Engineer at Google. He is expected to
10		Mountain View, CA 94043	testify about Waymo's first awareness of alleged trade secret
11			misappropriation; Waymo's forensic investigation into alleged
12			misappropriation of trade secret misappropriation, including the
13			conclusions drawn from that
14			investigation; and Waymo's measures to protect the security of Waymo's
15			confidential documents, servers, and SVN repository.
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1	Witness	Contact Information	Trial Testimony
2	Burnette, Don	[Contact through counsel of record]	Mr. Burnette is a technical lead for software at Uber, and previously
3		Uber Technologies, Inc.	worked at Google prior to co-founding Otto. He may testify regarding the
4		1455 Market Street, Floor 4	nature of employment at Waymo and Defendants; Defendants' non-
5		San Francisco, CA 94103	misappropriation of Waymo's trade secrets; formation, purpose, and
6			business of Ottomotto; Ottomotto's decision to be acquired by Defendants;
7			Development and operation of Waymo's autonomous vehicle
8			program; Anthony Levandowski's departure from Waymo; Waymo's
9			policies surrounding side projects and side businesses; knowledge of Waymo
10			employee involvement in side projects and side businesses; knowledge of the
11			Project Chauffeur bonus program; Stroz due diligence for the
12			Uber/Ottomotto acquisition; and confirmation of the absence of
13			evidence of trade secret misappropriation through and during
14	CI D		compliance with the Court's provisional remedy order.
15	Chu, Dan	Waymo LLC 1600 Amphitheatre Parkway	Mr. Chu is Director of Product at Waymo. He is expected to testify
16		Mountain View, CA 94043	regarding estimates and forecasts of the ride-sharing market and Waymo's
17			share of the ride-sharing market and Waymo's business and strategic plans
18			(and plans generally) for the ride- sharing market, including projections
19			for revenue generation and profitability and including Transportation as a
20			Service (TaaS), and the creation of documents that analyzed competition
21			with Uber.
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Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

1	Witness	<b>Contact Information</b>	Trial Testimony
2	Dolgov, Dmitri	Waymo LLC	Mr. Dolgov is Vice President of
2		1600 Amphitheatre Parkway	Engineering at Waymo. He is expected to testify regarding design,
3		Mountain View, CA 94043	development, and operation of
5		,	Waymo's LiDAR systems, self-driving
4			car project, and purported trade secrets;
5			Waymo's employee policies concerning confidential and trade
6			secret information; Waymo's policies surrounding side projects and side
7			businesses; knowledge of Waymo employee involvement in side projects
			and side businesses, including that of
8			Anthony Levandowski; and knowledge
9			of the Project Chauffeur bonus program.
	Droz, Pierre-Yves	Waymo LLC	Mr. Droz is Principal Hardware
10	Dioz, riene rves		Engineer at Waymo, serving as
		1600 Amphitheatre Parkway	technical lead on Waymo's LiDAR
11		Mountain View, CA 94043	project since its inception. He is
12			expected to testify about Waymo's employee policies concerning
12			confidential and trade secret
13			information, including with respect to
14			hardware; the design, development, and operation of Waymo's LiDAR systems,
15			self-driving car project, and purported trade secrets; whether and to what
			extent the allegedly misappropriated
16			files contain Waymo's alleged trade secrets; Waymo's awareness of the
17			extent to which each of the alleged Waymo trade secrets selected for trial
18			other than trade secret 25, or elements
19			thereof, are known or practiced outside of Waymo; and Waymo's knowledge
20	Fidric, Bernard	Waymo LLC	of Odin Wave.  Mr. Fidric is a hardware engineer at
	Tidile, Belliaid	1600 Amphitheatre Parkway	Waymo. He is expected to testify
21		Mountain View, CA 94043	regarding design, development, and
22		Wioumani view, CA 94045	operation of Waymo's LiDAR systems,
22			self-driving car project, and purported
23			trade secrets and Waymo's employee
24			policies concerning confidential and trade secret information.
_		1	and secret information.
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1	Witness	Contact Information	Trial Testimony
2	French, Paul	465 California Street	Mr. French is an expert retained by
_		Suite 1400	Waymo to testify regarding: (1) the
3		San Francisco, CA 94104	forensic examination of Uber-issued
		Phone: 415-321-8206	devices and data and confirmation of
4		Email: paul@discovia.com	the absence of evidence of trade secret misappropriation through and during
5			compliance with the Court's
			provisional remedy order and
6			(2) Waymo's forensic investigation of
7			Anthony Levandowski, Radu Raduta,
7			and Sameer Kshirsagar and Waymo's
8			methods to protect its confidential
			information and intellectual property
9			(including trade secrets). He is
10			expected to testify regarding the
10			matters disclosed in his expert reports
11			of September 14, 2017, November 17,
			2017, and January 13, 2018*.
12	Fulginiti, Mary	c/o Melanie M. Blunschi	Ms. Fulginiti was a managing director at Stroz Friedberg. She will testify
13		Latham & Watkins LLP	regarding Stroz Friedberg's
13		505 Montgomery Street	investigation and due diligence for
14		Suite 2000	Uber's potential acquisition of
		San Francisco, California 94111	Ottomotto and Otto Trucking, LLC,
15		(415) 391-0600	including with respect to the deletion of the 14,000 downloaded files.
16	Gardner, John	c/o Rogers Joseph O'Donnell	Mr. Gardner is an attorney at Donahue
10		311 California Street, 10th	Fitzgerald. He is expected to testify
17		Floor	regarding representation of Anthony
10		San Francisco, CA	Levandowski; knowledge of Odin Wave LLC, Tyto LiDAR LLC, and
18			Sandstone Group LLC; and Stroz due
19			diligence for the Uber/Ottomotto
			acquisition.
20	Gassend, Blaise	Waymo LLC	Mr. Gassend is a software engineer at
21		1600 Amphitheatre Parkway	<i>Waymo</i> . He is expected to testify
21		Mountain View, CA 94043	regarding design, development, and
22			operation of Waymo's LiDAR systems,
			self-driving car project, and purported
23			trade secrets and Waymo's employee
24			policies concerning confidential and trade secret information.
∠ <del>-1</del>		1	trade secret information.
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Grossman, William  Waymo LLC  1600 Amphitheatre Parkway Mountain View, CA 94043  Grossman, William  Waymo LLC  1600 Amphitheatre Parkway Mountain View, CA 94043  Gruver, Dan  [Contact through counsel of record]  Waymo's employee policies concerning confidential and trade seeret information; and Waymo's receipt of correspondence containing Defendants' LiDAR design.  Mr. Grossman is a mechanical engineer at Waymo. He is expected to testify regarding Waymo's knowledge of Defendants' LiDAR design.  Mr. Grover is a senior program manager at Uber, responsible for sensing systems for self-driving vehicle, and was formerly employed by Google. He may testify regarding the design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation in though and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Waymo LLC Kristinn	1	Witness	<b>Contact Information</b>	Trial Testimony
1600 Amphitheatre Parkway   Mountain View, CA 94043   Mountain View, CA 94043   Engineer at Waymo. He is expected to testify regarding Waymo's knowledge of Defendants' LiDAR design; Waymo's employee policies concerning confidential and trade secret information; and Waymo's receipt of correspondence containing Defendants' LiDAR design.    Gruver, Dan	1			
Mountain View, CA 94043  Gruver, Dan  Contact through counsel of record]  Correspondence containing Defendants' LiDAR design.  Mr. Gruver is a senior program manger at Uber, responsible for sensing systems for self-driving vehicle, and was formerly employed by Google. He may testify regarding the design and development of Defendants' LiDAR; Defendants' LiDAR design.  Mr. Gruver is a senior program manger at Uber, responsible for sensing systems for self-driving vehicle, and was formerly employed by Google. He may testify regarding the design and descrets; nature of employment at Waymo; waymo; waymo's trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential and trade secret information, including his role in the investigation and the conclusions	2	Grossman, wimam		
of Defendants' LiDAR design; Waymo's employee policies concerning confidential and trade secret information; and Waymo's receipt of correspondence containing Defendants' LiDAR design.  Gruver, Dan  [Contact through counsel of record]    Defendants' LiDAR design;   Mr. Gruver is a senior program manager at Uber, responsible for sensing systems for self-driving vehicle, and was formerly employed by Google.   He may testify regarding the design and development of Defendants' LiDAR, Defendants' LiDAR design.   He may testify regarding the design and development of Defendants' LiDAR, Defendants' non- misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.	2		-	
concerning confidential and trade secret information; and Waymo's receipt of correspondence containing Defendants' LiDAR design.  Gruver, Dan  [Contact through counsel of record]  [Contact through counsel of record and development of Defendants' non-misappropriation of twaymo's trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  [Condjunsson, Kristinn]  [Condjunsson of trade secret misappropriation into allege	3		Wiountain View, CA 74043	
Secret information; and Waymo's receipt of correspondence containing Defendants' LiDAR design.	4			Waymo's employee policies
Gruver, Dan  [Contact through counsel of record]  [Contact through counsel of responsible for sensing systems for self-driving vehicle, and was formerly employed by Google. He may testify regarding the design and development of Defendants' LiDAR (befordants' non-misappropriation through and trade secret misappropriation for Waymo's confidential and trade secret information, including his role in the investigation and the conclusions				
Gruver, Dan  [Contact through counsel of record]  [Contact through counsel of wars for self-driving vehicle, and was formerly enployed by Google. He hay testify regarding the design and development of Defendants' LiDAR; pefendants' non-misappropriation of Waymo's trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  [Contact the security of Waymo's measures to protect the security of Waymo's confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation into alleged misappropriation in to ladding his role in the investigation and the conclusions	5			
Gruver, Dan  [Contact through counsel of record]  [Contact through counsel of sensing systems for self-driving vehicle, and was formerly employed by Google. He may testify regarding the design and development of Defendants'  [Contact through and development of Defendants'  [Contact through and very server; and confirmation, including with respect to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project to hardware; knowledge of the Project Chair by a project Chair by a project to hardware project to hardware project to hardware project to hardwa	6			
record]  manager at Uber, responsible for sensing systems for self-driving vehicle, and was formerly employed by Google. He may testify regarding the design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Gudjunsson, Kristinn  Waymo LLC  1600 Amphitheatre Parkway Mountain View, CA 94043  Mar. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions		C D		
Sensing systems for self-driving vehicle, and was formerly employed by Google. He may testify regarding the design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Waymo LLC  1600 Amphitheatre Parkway Mountain View, CA 94043  Waymo; Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information, including with respect to the security of Waymo's confidential and confirmation of trade secret misappropriation into alleged misappropriation, including his role in the investigation and the conclusions	7	Gruver, Dan		
Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103  LiDAR; Defendants' LiDAR; Defendants' LiDAR; Defendants' LiDAR; Defendants' non- misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	0		record	
10 San Francisco, CA 94103  He may testify regarding the design and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Gudjunsson, Kristinn  Waymo LLC  1600 Amphitheatre Parkway Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  Waymo's measures to protect the security of Waymo's confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	0		Liber Technologies Inc	
San Francisco, CA 94103  San Francisco, CA 94103  and development of Defendants' LiDAR; Defendants' non-misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Gudjunsson, Kristinn  Waymo LLC  1600 Amphitheatre Parkway Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  Son Francisco, CA 94103  All Maymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	9		_	
LiDAR; Defendants' non- misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Gudjunsson, Kristinn  Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  ELiDAR; Defendants' non- misappropriation of Waymo's trade secrets; nature of employment at Waymo; Waymo's endouge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation into alleged misappropriation into alleged misappropriation, including his role in the investigation and the conclusions	10		ŕ	
secrets; nature of employment at Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Gudjunsson, Kristinn  Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	10		Sun Francisco, Cri y 1103	LiDAR; Defendants' non-
Waymo; Waymo's employee policies concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Gudjunsson, Kristinn  Waymo LLC  1600 Amphitheatre Parkway Mountain View, CA 94043  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	11			·
concerning confidential and trade secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	10			
secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Waymo LLC  1600 Amphitheatre Parkway  Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  Secret information, including with respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	12			
respect to hardware; knowledge of the Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.    Gudjunsson, Kristinn	13			
Project Chauffeur bonus program; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.    Recompliance with the Court's provisional remedy order.	1.4			
evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	14			Project Chauffeur bonus program; and
misappropriation through and during compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	15			
Compliance with the Court's provisional remedy order.  Gudjunsson, Kristinn  Waymo LLC  1600 Amphitheatre Parkway Mountain View, CA 94043  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	1.0			
Gudjunsson, Kristinn  Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	16			
Gudjunsson, Kristinn  Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043  Mr. Gudjunsson is Manager of Digital Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	17			
Kristinn  1600 Amphitheatre Parkway Mountain View, CA 94043  Forensics and Incident Management at Google. He is expected to testify regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation, including his role in the investigation and the conclusions	1.0	Gudiunsson.	Waymo LLC	
Mountain View, CA 94043  Mountain View, CA 94043  Mountain View, CA 94043  regarding Waymo's measures to protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation of trade secret misappropriation, including his role in the investigation and the conclusions	18	3		Forensics and Incident Management at
protect the security of Waymo's confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation of trade secret misappropriation, including his role in the investigation and the conclusions	19			Google. He is expected to testify
confidential documents, servers, and SVN repository; Waymo's employee policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation of trade secret misappropriation, including his role in the investigation and the conclusions				
policies concerning confidential and trade secret information; and Waymo's forensic investigation into alleged misappropriation of trade secret misappropriation, including his role in the investigation and the conclusions	20			confidential documents, servers, and
trade secret information; and Waymo's forensic investigation into alleged misappropriation of trade secret misappropriation, <i>including his role in the investigation</i> and the conclusions	21			
forensic investigation into alleged misappropriation of trade secret misappropriation, including his role in the investigation and the conclusions				
misappropriation, including his role in the investigation and the conclusions	22			forensic investigation into alleged
the investigation and the conclusions	23			
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1	Witness	<b>Contact Information</b>	Trial Testimony
2	Hesselink,	Spilker Building, Room 301	Dr. Hesselink is an expert retained by
2	Lambertus	Stanford University	Waymo to testify regarding Defendants' alleged misappropriation
3		Stanford, California 94305	of Waymo's trade secrets. He is
		Phone: 415-269-7102	expected to testify regarding the
4		Email: Bert@kaos.stanford.edu	matters disclosed in his expert reports
_			of August 24, 2017, and
5			September 14, 2017, and his
6	Holden, Jeff	[Contact through counsel of	declaration of September 5, 2017.  Mr. Holden is Chief Product Officer at
	Tiolden, Jen	[Contact through counsel of record]	Uber, responsible for product
7		record	development. He may testify regarding
0		Liber Technologies Inc	defendants' business model and
8		Uber Technologies, Inc.	strategy for autonomous vehicles;
9		1455 Market Street, Floor 4	Defendants' autonomous vehicle program; Uber's decision to acquire
		San Francisco, CA 94103	Ottomotto; and confirmation of the
10			absence of evidence of trade secret
1 1			misappropriation through and during
11			compliance with the Court's
12	Ingram, Ben	WIIC	provisional remedy order.  Mr. Ingram is a systems engineer at
	Ingram, Den	Waymo LLC	Waymo. He is expected to testify
13		1600 Amphitheatre Parkway	regarding the design, development, and
1.4		Mountain View, CA 94043	operation of Waymo's LiDAR systems,
14			self-driving car project, and purported
15			trade secrets; Waymo's employee
			policies concerning confidential and
16			trade secret information; and Waymo's
17			awareness of the extent to which
1 /			alleged Waymo trade secret 25, or
18			elements thereof, is known or practiced
			outside of Waymo.
19	Janosko, Michael	Waymo LLC	Mr. Janosko is a Security Engineering
20		1600 Amphitheatre Parkway	Manager at Google. He is expected to
20		Mountain View, CA 94043	testify regarding Waymo's measures to
21			protect the security of Waymo's confidential documents, servers, and
			SVN repository and Waymo's
22			employee policies concerning
23			confidential and trade secret
دے			information.
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Witness	<b>Contact Information</b>	Trial Testimony
Juelsgaard, Soren	[Contact through counsel of record]	Mr. Juelshaard is a senior engineer at Uber and previously worked at
		510 Systems. He may testify regarding
	Uber Technologies, Inc. 1455 Market Street, Floor 4	Stroz due diligence for the Uber/Ottomotto acquisition;
	San Francisco, CA 94103	Defendants' non-misappropriation of Waymo's trade secrets; and
		confirmation of the absence of
		evidence of trade secret misappropriation through and during
		compliance with the Court's
Kim, Rudy	Morrison & Foerster LLP	provisional remedy order.  Mr. Kim is a partner at Morrison &
	755 Page Mill Road	Foerster LLP. He may testify
	Palo Alto, CA 94304 Phone: (650) 813-5600	regarding the intellectual property due diligence for the Uber/Ottomotto
	1 none. (650) 615 5600	acquisition and inspection pursuant to the Court's provisional remedy order.
Kintz, Gregory		Mr. Kintz is an expert retained by
		Waymo to testify regarding Defendants' alleged misappropriation
		of Waymo's trade secrets. He is
		expected to testify regarding the matters disclosed in his declarations of
		March 10, 2017, and April 21, 2017.

1	Witness	<b>Contact Information</b>	Trial Testimony
2	Levandowski,	Contact through counsel:	Mr. Levandowski was former Vice
2	Anthony		President of Engineering at Uber,
3		Ismail Ramsey or Miles Ehrlich	co-founder of Ottomotto, and founder
		Ramsey & Ehrlich LLP	of 510 Systems. He was also formerly
4		803 Hearst Avenue	employed by Waymo. He is expected to
5		Berkeley, CA 94710	testify regarding the nature of his
3			employment at Waymo and Defendants; design and development of
6			Defendants' LiDAR; Defendants'
_			autonomous vehicle program;
7			Defendants' non-misappropriation of
8			Waymo's trade secrets; business of
0			Otto Trucking LLC; knowledge of
9			Odin Wave LLC and Tyto
10			LiDAR LLC; Waymo's employee
10			policies concerning confidential and
11			trade secret information, including with
			respect to hardware; knowledge of the
12			Project Chauffeur bonus program;
13			March 11, 2016 meeting with Anthony Levandowski; Stroz due diligence for
13			the Uber/Ottomotto acquisition; and
14			Uber's security group (including SSG,
15			MA, and Threat Operations) as it
13			relates to Uber's ATG*; Uber's
16			competitive intelligence practices*; and
17			the use of non-attributable devices,
17			ephemeral communications, and
18			attorney-client privileged designations
	T :1 A -1		within Uber's ATG*.
19	Linaval, Asheem	[Contact through counsel of record]	Mr. Linaval is an electrical engineer at Uber and previously worked at
20		record	510 Systems, Google, Odin Wave, and
20		Uber Technologies, Inc.	Tyto. He may testify regarding
21		1455 Market Street, Floor 4	Defendants' autonomous vehicle program and confirmation of the
22		San Francisco, CA 94103	absence of evidence of trade secret
22		San 1 micisco, 011 77103	misappropriation through and during
23			compliance with the Court's
	McCann, William	W IIC	provisional remedy order.
24	ivicCaiiii, vviiiiaiii	Waymo LLC	Mr. McCann is a mechanical engineer at Waymo. He is expected to testify
25		1600 Amphitheatre Parkway	regarding design, development, and
		Mountain View, CA 94043	operation of Waymo's LiDAR systems,
26			self-driving car project, and purported
27			trade secrets; and Waymo's employee
21			policies concerning confidential and
28			trade secret information.

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Witness	Contact Information	Trial Testimony
Medford, Ron	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Mr. Medford is Waymo's Director for Safety. He is expected to testify regarding safety assessments, public policy, and regulatory work relating to autonomous vehicles, and involvement in safety-related matters.
Morgan, Rhian	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Ms. Rhian is the Team Engagement Coordinator at Uber and was formerly the human resources lead at Ottomotto. She may testify regarding hiring and onboarding process for Uber and Ottomotto, including hiring agreements; steps taken by Defendants to prevent trade secrets from prior employers of Defendants' employees coming to Defendants; and confirmation of the absence of evidence of trade secret misappropriation through and during compliance with the Court's provisional remedy order.
Morriss, Zachary	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Mr. Morriss is a mechanical engineer at Waymo and previously worked at Anthony's Robots. He is expected to testify regarding Waymo's employee policies concerning confidential and trade secret information; and the design, development, and operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets.

Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

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1	Witness	<b>Contact Information</b>	Trial Testimony
1	Padilla, Angela		Ms. Padilla is Associate General
2	i adilia, Aligeia	[Contact through counsel of record]	Counsel for Litigation and Employment
		record	at Uber. She may testify regarding the
3			termination of Anthony Levandowski;
		Uber Technologies, Inc.	Stroz due diligence for the
4		1455 Market Street, Floor 4	Uber/Ottomotto acquisition;
_		San Francisco, CA 94103	confirmation of the absence of
5			evidence of trade secret
6			misappropriation through and during compliance with the Court's
U			provisional remedy order; Anthony
7			Levandowski's claim that he
			downloaded and retained alleged
8			misappropriated materials to facilitate
			bonus payment(s) from Waymo; the
9			investigation and her knowledge of
10			allegations in the April 14, 2017
10			resignation email from Richard Jacobs
11			and May 5, 2017 demand letter from his attorney*; Uber's practices
11			regarding non-attributable devices,
12			competitive intelligence, ephemeral
			communications, and attorney-client
13			privileged designations*; and
1.4			involvement in and knowledge of
14			Uber's data retention policies and
15	Dolomon Motthers		programs.*  Mr. Palomar is a hardware engineer at
1.5	Palomar, Matthew	[Contact through counsel of	Uber and was previously an engineer
16		record]	at Tyto. He may testify regarding the
			design and development of Defendants'
17		Uber Technologies, Inc.	LiDAR; Defendants' non-
1.0		1455 Market Street, Floor 4	misappropriation of Waymo's trade
18		San Francisco, CA 94103	secrets; and confirmation of the
19			absence of evidence of trade secret
19			misappropriation through and during compliance with the Court's
20			provisional remedy order.
	L	1	provisional remoty order.
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Defendants Uber and Ottomotto's Fed. R. Civ. P. 26(A)(3) Witness List Case No. 3:17-cv-00939-WHA sf-3823367

1	Witness	Contact Information	Trial Testimony
1	Pennecot, Gaetan	[Contact through counsel of	Mr. Pennecot is a hardware engineer
2	Temiceot, Guetan	record]	at Uber. He formerly worked as a
2			hardware engineer at 510 Systems and
3		Uber Technologies, Inc.	Google. He may testify regarding the
4		1455 Market Street, Floor 4	design and development of Defendants' LiDAR; Defendants'
-		San Francisco, CA 94103	non-misappropriation of Waymo's
5			trade secrets; nature of employment at
6			Waymo; Waymo's employee policies concerning confidential and trade
7			secret information, including with respect to hardware; knowledge of the
			Project Chauffeur bonus program; and
8			confirmation of the absence of
9			evidence of trade secret misappropriation through and during
			compliance with the Court's
10			provisional remedy order.
11	Qi, Nina	[Contact through counsel of	Ms. Qi is the former Senior Manager of
11		record]	Corporate Development at Uber. She may testify regarding defendants' non-
12			misappropriation of Waymo's trade
		Uber Technologies, Inc.	secrets; business of Otto
13		1455 Market Street, Floor 4	Trucking LLC; Uber's decision to
14		San Francisco, CA 94103	acquire Ottomotto; March 11, 2016 meeting with Anthony Levandowski;
17			and confirmation of the absence of
15			evidence of trade secret
1.0			misappropriation through and during
16			compliance with the Court's
17	Sebern, Colin	[Contact through council of	provisional remedy order.  Mr. Sebern works on vehicle-building
	Scotin, Com	[Contact through counsel of record]	and calibration at Uber and previously
18			worked at Ottomotto and Google. He
19		Uber Technologies, Inc.	may testify regarding Stroz due diligence for the Uber/Ottomotto
1)		1455 Market Street, Floor 4	acquisition; Defendants' non-
20		San Francisco, CA 94103	misappropriation of Waymo's trade
21			secrets; and confirmation of the
21			absence of evidence of trade secret misappropriation through and during
22			compliance with the Court's
2.2			provisional remedy order.
23	Stojanowski, Ognen	[Contact through counsel of	Mr. Stojanowski is Head of Policy and
24		record]	Government Relations at Uber. He may testify regarding knowledge of
			Odin Wave LLC, Tyto LiDAR LLC,
25		Uber Technologies, Inc.	and Sandstone Group LLC, and
26		1455 Market Street, Floor 4	confirmation of the absence of
20		San Francisco, CA 94103	evidence of trade secret misappropriation through and during
27			compliance with the Court's
20			provisional remedy order.
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Witness	<b>Contact Information</b>	Trial Testimony
Suhr, Justin	[Contact through counsel of record]	Mr. Suhr is a Legal Director at Uber, specializing in employment issues. He
	Uber Technologies, Inc.	may testify regarding Stroz due diligence for the Uber/Ottomotto
	1455 Market Street, Floor 4	acquisition; Uber's decision to acquire Ottomotto and structure of the acquisition; and confirmation of the
	San Francisco, CA 94103	absence of evidence of trade secret misappropriation through and during
	M · OF	compliance with the Court's provisional remedy order.
Tate, Eric	Morrison & Foerster LLP 425 Market Street San Francisco, CA 94105	Mr. Tate is a partner at Morrison & Foerster LLP. He may testify regarding the Stroz due diligence for
	Phone: (415) 268-7000	the Uber/Ottomotto acquisition* and confirmation of the absence of
		evidence of trade secret misappropriation through and during
		compliance with the Court's provisional remedy order.
Thrun, Sebastian		Mr. Thrun is Chief Executive Officer of Kitty Hawk Corporation and formerly head of Waymo and Google[x]. He is
	Contact through counsel: Christopher B. Hockett	expected to testify regarding development and operation of
	Davis Polk & Wardwell LLP 1600 El Camino Real	Waymo's autonomous vehicle program; Anthony Levandowski's
	Menlo Park, CA 94025 Phone: (650) 752-2009 Email:	departure from Waymo; Waymo's employee policies concerning confidential and trade secret
	chris.hockett@davispolk.com	information; Waymo's policies surrounding side projects and side
		businesses; knowledge of Waymo employee involvement in side projects
		and side businesses, including that of Anthony Levandowski; knowledge of
		the Project Chauffeur bonus program, and his introduction of Travis Kalanici to Mr. Levandowski.
Ulrich, Drew	Waymo LLC 1600 Amphitheatre Parkway	Mr. Ulrich is a mechanical engineer a. Waymo, and previously work at 510
	Mountain View, CA 94043	Systems. He is expected to testify regarding Waymo's employee policies
		concerning confidential and trade secret information and the design,
		development, and operation of Waymo's LiDAR systems and self-
		driving car project.

1	Witness	<b>Contact Information</b>	Trial Testimony
2 3	Wachter, Luke	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Mr. Wachter is a software engineer at Waymo and previously worked at 510 Systems. He is expected to testify regarding the design, development, and
<ul><li>4</li><li>5</li><li>6</li></ul>			operation of Waymo's LiDAR systems, self-driving car project, and purported trade secrets and Waymo's employee policies concerning confidential and trade secret information.
7 8 9 10	Willis, Tim	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Mr. Willis is Head of Global Supply at Waymo. He is expected to testify regarding Waymo's supply chain operations and Waymo's employee policies concerning confidential and trade secret information.
11 12 13	Adkins, Heather*	Waymo LLC 1600 Amphitheatre Parkway Mountain View, CA 94043	Heather Adkins is the director of information security and privacy at Google. Ms. Adkins may testify regarding Google and Waymo's use of non-attributable or mis-attributable
14			devices; and Google and Waymo's competitive intelligence gathering and market analysis.
15 16 17 18	Gicinto, Nick*	[Contact through counsel of record]  Uber Technologies, Inc. 1455 Market Street, Floor 4 San Francisco, CA 94103	Nick Gicinto works in Uber's security group. Mr. Gicinto may testify regarding Uber's security group's practices regarding non-attributable devices, ephemeral communications, and attorney-client privileged designations; Uber's competitive
19 20			intelligence practices; relationship and interaction with Uber ATG.
21	Haimovici, Randy*	[Contact through counsel of record]	Randy Haimovici is a director in Uber's litigation department. Mr. Haimovici may testify regarding the
22 23		Uber Technologies, Inc. 1455 Market Street, Floor 4	investigation and his knowledge of allegations in the April 14, 2017 resignation email from Richard Jacobs
24		San Francisco, CA 94103	and May 5, 2017 demand letter from his attorney; Uber's practices regarding
25			non-attributable devices, competitive intelligence, ephemeral communications, and attorney-client
<ul><li>26</li><li>27</li></ul>			privileged designations; and Uber's data retention policies and programs.
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1	Witness	Contact Information	Trial Testimony
2	Henley, Mathew*	[Contact through counsel of	Mathew Henley works in Uber's
2		record]	security group. Mr. Henley may testify
3			regarding Uber's security group's practices regarding non-attributable
4		Uber Technologies, Inc.	devices, ephemeral communications,
4		1455 Market Street, Floor 4	and attorney-client privileged
5		San Francisco, CA 94103	designations; Uber's competitive
			intelligence practices; relationship and
6			interaction with Uber ATG.
7	Jacobs, Richard*	Boersch Shapiro	Richard Jacobs previously worked in
0		1611 Telegraph Avenue, Suite	Uber's security group. Mr. Jacobs may
8		806	testify concerning the allegations in his April 14, 2017 resignation email and
9		Oakland, CA 94612	the May 5, 2017 demand letter from his
1.0			attorney; security group's practices
10			regarding non-attributable devices,
11			ephemeral communications, and
10			attorney-client privileged designations;
12			Uber's competitive intelligence practices; relationship and interaction
13			with Uber ATG.
1.4	Johnston, Scott*	Waymo LLC	Scott Johnston is the Director of
14		1600 Amphitheatre Parkway	Product Management at Google. Mr.
15		Mountain View, CA 94043	Johnston may testify regarding Waymo
16			and Google's use of and policy
16			regarding ephemeral communications, including "off the record" chats in
17			electronic chat programs and apps; and
10			Google and Waymo's policies
18			regarding the retention of electronic
19			communications.
20	Majalya, Sidney*	[Contact through counsel of record]	Sidney Majalya is a director in Uber's compliance group. Mr. Majalya may
21			testify regarding the investigation and his knowledge of allegations in the
		Uber Technologies, Inc.	April 14, 2017 resignation email from
22		1455 Market Street, Floor 4 San Francisco, CA 94103	Richard Jacobs and May 5, 2017 demand letter from his attorney; Uber's
23		San Francisco, CA 94103	practices regarding non-attributable
24			devices, competitive intelligence, ephemeral communications, and
24			attorney-client privileged designations.
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1	Witness	Contact Information	Trial Testimony
	Maher, Kevin*	[Contact through counsel of	Kevin Maher works in Uber's security
2		record]	group. Mr. Maher may testify
3			regarding Uber's security group's
		Uber Technologies, Inc.	practices regarding non-attributable
4		1455 Market Street, Floor 4	devices, ephemeral communications, and attorney-client privileged
5		San Francisco, CA 94103	designations; Uber's competitive
			intelligence practices; relationship and
6			interaction with Uber ATG.
7	Nocon, Jake*	[Contact through counsel of	Jake Nocon works in Uber's security
		record]	group. Mr. Nocon may testify
8			regarding Uber's security group's
9		Uber Technologies, Inc.	practices regarding non-attributable devices, ephemeral communications,
		1455 Market Street, Floor 4	and attorney-client privileged
10		San Francisco, CA 94103	designations; Uber's competitive
11			intelligence practices; relationship and
11			interaction with Uber ATG.
12	Russo, Edward*	[Contact through counsel of	Edward Russo works in Uber's security
13		record]	group. Mr. Russon may testify
13			regarding Uber's security group's practices regarding non-attributable
14		Uber Technologies, Inc.	devices, ephemeral communications,
15		1455 Market Street, Floor 4	and attorney-client privileged
13		San Francisco, CA 94103	designations; Uber's competitive
16			intelligence practices; relationship and
17			interaction with Uber ATG.
1 /	Spiegler, Joe*	[Contact through counsel of	Joe Spiegler was previously Uber's Chief Compliance Officer. Mr.
18		record]	Spiegler may testify regarding the
10		Uber Technologies, Inc.	investigation and his knowledge of
19		1455 Market Street, Floor 4	allegations in the April 14, 2017 resignation email from Richard Jacobs
20		San Francisco, CA 94103	and May 5, 2017 demand letter from
21		Sui Tuneisco, Cri 71103	his attorney; Uber's practices regarding
21			non-attributable devices, competitive intelligence, ephemeral
22			communications, and attorney-client
23			privileged designations.
23			
24	Stewart, Shaun*	Waymo LLC	Shaun Stewart is Waymo's Director of
25	Sicwart, Shaun	Waymo LLC 1600 Amphitheatre Parkway	Operations. Mr. Stewart may testify
23		Mountain View, CA 94043	regarding Google and Waymo's
26		Wiodinam View, CA 74043	surveillance of competitors.
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1	Witness	Contact Information	Trial Testimony
2	Sullivan, Joe*	Angeli Law Group LLC 121 SW Morrison Street	Joe Sullivan was previously the Chief Security Officer at Uber. Mr. Sullivan
3		Suite 400 Portland, OR 97204	may testify regarding Uber's security group's practices regarding non-
4		Tornand, OR 9/204	attributable devices, ephemeral
5			communications, and attorney-client privileged designations; Uber's
6			competitive intelligence practices; relationship and interaction with Uber
7	Yoo, Salle*	[Contact through council of	ATG. Salle Yoo is the former Chief Legal
8	100, Sanc	[Contact through counsel of record]	Officer, General Counsel, and
9		Uber Technologies, Inc.	Corproate Secretary for Uber. Ms. Yoo may testify regarding the
10		1455 Market Street, Floor 4 San Francisco, CA 94103	investigation and her knowledge of allegations in the April 14, 2017
11		Sun Francisco, CFI 74103	resignation email from Richard Jacobs and May 5, 2017 demand letter from
12			his attorney; Uber's practices regarding non-attributable devices, competitive
13			intelligence, ephemeral
14			communications, and attorney-client privileged designations; Involvement in
15			and knowledge of Uber's data retention policies and programs.
16	Uber reserves the right to call any witness identified by Waymo. The above descriptions		

Uber reserves the right to call any witness identified by Waymo. The above descriptions are not intended to cover every possible topic or sub-topic on which these witnesses may testify and are made without prejudice to Uber eliciting other testimony, including without limitation testimony regarding matters addressed during the deposition of a given witness.

#### II. DEPOSITION TESTIMONY

sf-3823367

Uber reserves the right to present the deposition testimony of Waymo's managing agents and 30(b)(6) designees (i.e., Gary Brown, Pierre-Yves Droz, Dmitri Dolgov, Michael Xing, Joanne Chin, David Lawee, Jennifer Haroon, Ben Ingram, Aslan (Shawn) Bananzadeh, Shaun Stewart, Scott Johnston, and Heather Adkins), in addition to or in lieu of their live testimony. Uber also reserves the right to present the deposition testimony of any witnesses listed above to the extent permitted by Federal Rule of Civil Procedure 32.

Uber may present testimony from the following additional witnesses by deposition:

1	Witness	Contact Information	Trial Testimony
2	Bares, John	[Contact through counsel of	Mr. Bares is the former Operations
		record]	Director at Uber's Advanced
3		Liber Technologies Inc	Technologies Group. Uber may present
4		Uber Technologies, Inc. Advanced Technologies	his deposition testimony regarding design and development of Defendants' LiDAR;
4		Center	Defendants' autonomous vehicle program;
5		100 32nd St, Pittsburgh, PA	Defendants' non-misappropriation of
		15201	Waymo's trade secrets; Defendants'
6			business model and strategy for
7			autonomous vehicles; Uber's decision to
/			acquire Ottomotto; steps taken by
8			Defendants to prevent trade secrets from
			prior employers of Defendants'
9			employees coming to Defendants; and
10			confirmation of the absence of evidence
10			of trade secret misappropriation through
11			and during compliance with the Court's
10	Dain Canaas		provisional remedy order.
12	Brin, Sergey	Alphabet Inc.	Mr. Brin is a co-founder of Google and President of Google's parent company,
13		1600 Amphitheatre Parkway	Alphabet Inc. Uber may present his
		Mountain View, CA 94043	deposition testimony regarding
14		Wountain View, CA 94043	development and operation of Waymo's
15			autonomous vehicle program; Anthony
13			Levandowski's departure from Waymo;
16			Waymo's policies surrounding side
17			projects and side businesses; and
17			knowledge of Waymo employee
18			involvement in side projects and side
			businesses, including that of Anthony
19	Drummond, David	A 1 - 1 - 1 - 4 T	Levandowski.  Mr. Drummond is Senior Vice President
20	Diummond, David	Alphabet Inc.	of Corporate Development at
20		1600 Amphitheatre Parkway	Alphabet Inc., Google's parent company,
21		Mountain View, CA 94043	and previously served on Uber's board of
22		Wioditain View, Cit 54043	directors while employed by Alphabet Inc.
22			Uber may present his deposition
23			testimony regarding Waymo's knowledge
			of Defendants' autonomous vehicle
24			program; knowledge of Waymo's
25			discussions with Defendants regarding a
20			partnership with Defendants in the self-
26			driving vehicle/ride-sharing space.
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Witness	<b>Contact Information</b>	Trial Testimony		
Page, Larry	Alphabet Inc. 1600 Amphitheatre Parkway Mountain View, CA 94043	Mr. Page is Google's co-founder and Chief Executive Office of Google's parent company, Alphabet Inc.  Uber may present his deposition testimony regarding development and operation of Waymo's autonomous vehicle program; Anthony Levandowski's departure from Waymo; Waymo's policies surrounding side projects and side businesses; knowledge of Waymo employee involvement in side projects and side businesses, including that of Anthony Levandowski; Waymo's business plans; knowledge of discussions with Defendants regarding a partnership with Defendants in the self-driving vehicle/ride-sharing space; and knowledge of the Project Chauffeur bonus program, and his concerns about competition from Uber and Anthony Levandowski.		
Uber reserves the right to designate testimony from any witness identified by Waymo.				
The above descriptions are not intended to cover every possible topic or sub-topic on which Uber				
may offer deposition excerpts and are made without prejudice to Uber offering other testimony.				

Dated: January 19, 2018 MORRISON & FOERSTER LLP

By: <u>/s/ Arturo J. González</u> ARTURO J. GONZÁLEZ

Attorneys for Defendants UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC

\* As explained in Defendants' Response to Waymo's Offer of Proof, Defendants object to Waymo offering evidence regarding the allegations made by Richard Jacobs. Defendants only identify the witnesses and trial testimony marked with an asterisk to the extent the Court disagrees and to the extent the topics fall within the subjects the Court permits at trial.

DEFENDANTS UBER AND OTTOMOTTO'S FED. R. CIV. P. 26(A)(3) WITNESS LIST Case No. 3:17-cv-00939-WHA sf-3823367